



**U.S. Department of Justice**

*United States Attorney's Office  
Southern District of Texas*

*1000 Louisiana  
Suite 2300  
Houston, Texas 77002*

*Phone: (713) 567-9000  
Fax: (713) 718-3300*

September 14, 2022

Honorable George C. Hanks, Jr.  
United States District Court  
Southern District of Texas

***Re: Status of cause no. 4:19-CR-832; United States v. Gerald M. Goines, et. al.***

Judge Hanks:

The United States and Gerald Goines jointly propose the Court continue the status conference scheduled for September 19, 2022 for 90 days.

Because of pending issues in a related Harris County criminal case, issues that should be resolved within 90 days, the parties request a continuance of the status conference. After the 90 days, the parties should be in a better position to articulate an appropriate schedule for motions deadlines, pretrial conference and trial, if one is needed.

Finally, because of the case's complexities, the parties respectfully request the Court continue the status conference under 18 U.S.C. § 3161(h)(7)(B)(i) & (ii) for 90 days.

Respectfully submitted,

/s/Arthur R. Jones  
Arthur R. Jones  
Assistant United States Attorney  
Southern District of Texas

/s/Alamdar S. Hamdani  
Alamdar S. Hamdani  
Assistant United States Attorney  
Southern District of Texas

/s/Nicole DeBorde  
Nicole DeBorde  
Counsel for Gerald Goines